

Pavitt, John

From: Sally McLeod <Sally.Mcleod@smmpogo.com>
Sent: Monday, August 12, 2013 10:28 AM
To: Valdez, Heather
Cc: Hedgpeth, Zach; Pavitt, John
Subject: RE: Revised Petition Pursuant to 40 CFR 60.2115
Attachments: 0513 CISWI Test Plan.pdf; COR-13-037 - Source Test Plan for Incinerator to EPA.pdf

Heather,

Our Source Test Plan will be the same as before (attached). We will just be re-submitting it to you along with a response to your informal suggestions.

Maybe Step could review this information and chat with Zach?

I would like to proceed with the August 22 meeting.

Sally S. McLeod, CEM, REM
Environmental Manager
Sumitomo Metal Mining Pogo LLC
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Fax: 907-895-2866

From: Valdez, Heather [mailto:Valdez.Heather@epa.gov]
Sent: Monday, August 12, 2013 9:20 AM
To: Sally McLeod
Cc: Hedgpeth, Zach; Pavitt, John
Subject: RE: Revised Petition Pursuant to 40 CFR 60.2115

Hi Sally, Zach, John Pavitt, and I are good for that date, Aug 22nd 9am Pacific. I can also have the headquarters OAQPS contact on the line, the CISWI rule writer, Toni Jones, in case she can be of assistance with details about the testing requirements. I had hoped to get Zach's headquarters counterpart, the technical source testing expert, Stef Johnson, on the phone as well. But, he will be out of the office and unavailable either week.

Stef is great at reviewing information and giving us good comments. And he has said that he could do that up until he goes on leave Aug 21st. So if you are able to share any more info, like the detailed source test plan in advance of the meeting, we could have Step review that, he and Zach could discuss it, and then Zach would be more prepared to share with you any feedback Stef may have to offer.

Otherwise the other option would be to put the meeting off until Step was also available to be on the phone with us. He will be back Sep 3rd. But I don't know if that puts you in too much of a pinch for the timing of your test, if you don't find out from us until after then what might need fine tuning in your petition or test plan.

Heather Valdez
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EPA Region 10
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R10 RICE Website, Engine Compliance Assistance

[http://yosemite.epa.gov/R10/airpage.nsf/Enforcement/rice\\_rules](http://yosemite.epa.gov/R10/airpage.nsf/Enforcement/rice_rules)

Boiler Area Source Compliance Assistance

<http://www.epa.gov/boilercompliance/>

Department of Energy Website on Energy Assessments

[http://www1.eere.energy.gov/manufacturing/tech\\_deployment/energy\\_assessment.html](http://www1.eere.energy.gov/manufacturing/tech_deployment/energy_assessment.html)

Non-Hazardous Secondary Materials

<http://www.epa.gov/epawaste/nonhaz/define/index.htm>

Combustion Regulatory Actions

<http://www.epa.gov/airquality/combustion/actions.html>

Boiler TTN Page

<http://www.epa.gov/ttn/atw/boiler/boilerpg.html>

RICE TTN Page

<http://www.epa.gov/ttn/atw/rice/ricepg.html>

Combustion Portal (compliance assistance for combustion regulations)

<http://www.combustionportal.org/>

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**From:** Sally McLeod [<mailto:Sally.Mcleod@smpogo.com>]

**Sent:** Monday, August 12, 2013 9:49 AM

**To:** Valdez, Heather

**Subject:** Re: Revised Petition Pursuant to 40 CFR 60.2115

Are we set for meeting yet? We need to make our travel arrangements.

Sally McLeod

Environmental Manager

Sumitomo Metal Mining Pogo LLC

On Aug 8, 2013, at 1:17 PM, "Valdez, Heather" <[Valdez.Heather@epa.gov](mailto:Valdez.Heather@epa.gov)> wrote:

Hi Sally, could you do 9am on the 22<sup>nd</sup>, if that works for you I am close to finalizing, I just need to confirm one more person at that time.

Heather Valdez

Chemical Engineer

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[valdez.heather@epa.gov](mailto:valdez.heather@epa.gov)

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http://yosemite.epa.gov/R10/airpage.nsf/Enforcement/rice_rules

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Department of Energy Website on Energy Assessments

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From: Sally McLeod [<mailto:Sally.Mcleod@smpogo.com>]
Sent: Thursday, August 08, 2013 10:51 AM
To: Valdez, Heather
Subject: RE: Revised Petition Pursuant to 40 CFR 60.2115

Great! Thanks. Zach has approval to come observe the next stack test.

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From: Valdez, Heather [<mailto:Valdez.Heather@epa.gov>]
Sent: Thursday, August 08, 2013 9:02 AM
To: Sally McLeod; john.kuterbach@alaska.gov
Cc: Michael Short; Hunter, Jeffrey (Perkins Coie); Rosburg, John; Chris Kennedy
Subject: RE: Revised Petition Pursuant to 40 CFR 60.2115

Thank you Sally, I am working to find out if the time you have suggested for a meeting will work, so far it is looking like the first day would be better, I will let you know for sure as soon as I can.

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**From:** Sally McLeod [<mailto:Sally.Mcleod@smpmpogo.com>]

**Sent:** Tuesday, August 06, 2013 7:17 PM

**To:** Valdez, Heather; [john.kuterbach@alaska.gov](mailto:john.kuterbach@alaska.gov)

**Cc:** Michael Short; Hunter, Jeffrey (Perkins Coie); Rosburg, John; Chris Kennedy

**Subject:** Revised Petition Pursuant to 40 CFR 60.2115

Heather,

Attached is Pogo's revised Petition. A hard copy will be certified mailed to the Director tomorrow.

Pogo would like to set up a meeting with you in Seattle. Would August 22 or 28 work?

The purpose of the meeting would be to present the results of our first incinerator stack test and discuss options for controls.

Both our stack test contractor and AQ specialist could be present. Therefore the focus would be technical discussion.

If needed, we'd like to follow up with a brief meeting with counsel to discuss Pogo's path forward.

Please give me a call if you wish to discuss.

Sally S. McLeod, CEM, REM

Environmental Manager

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